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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
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10 UNITED STATES OF AMERICA,)	CASE NO: 2:19-cr-00120-APG-NJK
)	
11 Plaintiff,)	
)	
12 vs.)	MOTION FOR RELEASE OF PASSPORT
)	
13 PHONG DANG NAM NGUYEN,)	
)	
14 Defendant.)	
15)	

16 COMES NOW, defendant, PHONG DANG NAM NGUYEN, through
17 undersigned counsel, and respectfully moves this Honorable Court for an Order
18 allowing Pretrial Services to release Mr. Nguyen's passport to his attorney of
19 record, Shawn R. Perez.

20 The defendant offers the following in support of this motion:

21 1. On September 30, 2022, this Court granted Mr. Nguyen's Motion to
22 Permit International Travel.

23 2. Mr. Nguyen will be leaving the country for Viet Nam on October 21,
24 2022, and will need his passport in order to leave the country. In this regard, time
25 is of the essence.

26 3. Pretrial Services in Las Vegas is in possession of Mr. Nguyen's
27 passport and will release the passport upon receipt of a signed Order.

28 WHEREFORE, the defendant, Phong Dang Nam Nguyen, respectfully

1 requests that this Court grant Mr. Nguyen's request and issue an Order allowing
2 Pretrial Services to release Mr. Nguyen's passport to his attorney, Shawn R. Perez.

3 Dated: October 11, 2022

Respectfully submitted,

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5 /s/ Shawn R. Perez, Esq.

6 SHAWN R. PEREZ, ESQ.
7 Attorney for Phong Nguyen
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11 IT IS SO ORDERED:

12 Dated: October 12, 2022

13 
14 ANDREW P. GORDON
15 UNITED STATES DISTRICT JUDGE
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